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March 12, 2024

**VIA ELECTRONIC CASE FILING**

Honorable Douglas E. Arpert, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building and Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *His All Holiness Bartholomew I, et al. v. Princeton University***  
**Civil Case No. 3:18-CV-17195-RK-DEA**

Dear Judge Arpert:

We represent Defendant, the Trustees of Princeton University, and respectfully submit this letter on behalf of the Parties, with Plaintiffs' consent. This letter is submitted pursuant to Your Honor's revised scheduling order of January 11, 2024, directing the parties to submit a joint status report by March 12, 2024. [ECF No. 144]

Shortly after the Court's January 11, 2024, order, and pursuant to the Court's November 16, 2022, order allowing for certain depositions to proceed, Princeton noticed the depositions of (1) the Ecumenical Patriarch's representative, (2) Plaintiffs' counsel, and (3) Prof. George Papazoglou.

The depositions of the Ecumenical Patriarch's representative and Plaintiffs' counsel are scheduled for March 13<sup>th</sup> and March 15<sup>th</sup>, respectively. Following a telephonic meet and confer, however, Plaintiffs informed Princeton that despite being asked and encouraged to sit for his deposition by the director of the Patriarchal Private Office, on behalf of the Patriarchate, Prof. George Papazoglou has refused to appear for any deposition.

With Prof. Papazoglou's refusal to appear for deposition, there remains at least one outstanding discovery issue for which Princeton will likely request the Court's attention. Princeton anticipates that following this week's depositions, it will prompt the Court, by letter, to schedule briefing on this, as well as any additional issues that exist or arise following this week's depositions.

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ATTORNEYS AT LAW

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Respectfully Submitted,

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By: /s/ Linda Wong  
Linda Wong

And

HAHN LOESER

Samuel C. Sneed